

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SHEILA PORTER, Plaintiff	)	
	)	
	)	
v.	)	
	)	Civil Action No. 04-11935-DPW
ANDREA CABRAL, SUFFOLK	)	
COUNTY SHERIFF'S DEPARTMENT,	)	
SUFFOLK COUNTY, and	)	
CORRECTIONAL MEDICAL	)	
SERVICES, INC.	)	
Defendants	)	
	)	

**DEFENDANTS ANDREA CABRAL, SUFFOLK COUNTY SHERIFF'S  
DEPARTMENT AND SUFFOLK COUNTY'S MOTION TO COMPEL THE  
PRODUCTION OF TESTIMONY AND DOCUMENTS FROM THE FBI.**

Now come the above named Defendants and respectfully request that this Court issue an order compelling the FBI to comply with the subpoenas issued by the Defendants requesting the production of information, documents and testimony of Special Agents Maureen Robinson and Christa Snyder. As reasons therefore the Defendants state that such information and testimony is highly relevant and necessary to the Defendants' ability to defend the allegations set forth in the Plaintiff's amended complaint. Further, the United States Attorney's refusal to authorize the FBI to comply with the subpoenas constitutes an abuse of discretion. The Defendants also rely on the attached Memorandum of Law.

**Defendants Respectfully Request A Hearing On Their Motion.**

Respectfully submitted,  
For the Defendants Andrea Cabral,  
Suffolk County Sheriff's Department,  
And Suffolk County  
By their Attorney

/s/ Ellen M. Caulo  
Ellen M. Caulo  
B.B.O. #545250  
Deputy General Counsel  
Suffolk County Sheriff's Department  
200 Nashua Street  
Boston, MA 02114  
(617) 989-6681

Date: July 15, 2005

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)**

Counsel for the Defendants hereby certifies pursuant to Local Rule 7.1 that she has conferred with Assistant United States Attorney Anton Giedt in an effort to confer and resolve the issues raised by the instant motion.

/s/ Ellen M. Caulo  
Ellen M. Caulo